

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION**

SUMMIT 6 LLC,

Plaintiff,

v.

HTC CORPORATION, HTC AMERICA,
INC., LG ELECTRONICS INC., LG
ELECTRONICS USA, INC., LG
ELECTRONICS MOBILECOMM USA,
INC., MOTOROLA MOBILITY LLC, and
TWITTER, INC.,

Defendants.

Case Action No. 7:14-cv-00014-O

JURY TRIAL DEMANDED

SUMMIT 6 LLC,

Plaintiff,

v.

APPLE INC.

Defendant.

Case Action No. 7:14-cv-00106-O

JURY TRIAL DEMANDED

DEFENDANTS' NOTICE OF SUPPLEMENTAL AUTHORITY

Defendants hereby submit this Notice of Supplemental Authority in support of their positions regarding the indefiniteness of the terms “code means” and “media object identifier.” Attached hereto as Exhibit A is the March 10, 2015 decision of the United States District Court for the District of Utah in *Dreissen v. Sony Music Entertainment*, No. 2:09-cv-0140-CW (Dkt. No. 228). The relevant analysis may be found on pages 5-21.

Dated: March 13, 2015

By: /s/ Julie A. Duncan

David Silbert *Pro Hac Vice*
Leo Lam *Pro Hac Vice*
Julie A. Duncan *Pro Hac Vice*
KEKER & VAN NEST LLP
633 Battery Street
San Francisco, CA 94111-1809
Telephone: 415 391 5400
Facsimile: 415 397 7188
dsilbert@kvn.com
llam@kvn.com
jduncan@kvn.com

Brett C. Govett
Norton Rose Fulbright US LLP
2200 Ross Ave., Suite 3600
Dallas, TX 75201-7932
Telephone: 214.855.8118
Facsimile: 214.855.8200
brett.govett@nortonrosefulbright.com

Attorneys for Defendant TWITTER, INC.

/s/ Mark D. Selwyn

Jason Kipnis (admitted *Pro Hac Vice*)
Katherine D. Prescott (admitted *Pro Hac Vice*)
Mark D. Selwyn (admitted *Pro Hac Vice*)
WILMER CUTLER PICKERING HALE
AND DORR LLP
950 Page Mill Road
Palo Alto, CA 94304
Telephone: 650.858.6000
Facsimile: 650.858.6100
jason.kipnis@wilmerhale.com
katherine.prescott@wilmerhale.com
mark.selwyn@wilmerhale.com

Kevin S. Prussia (admitted *Pro Hac Vice*)
WILMER CUTLER PICKERING HALE
AND DORR LLP
60 State Street
Boston, MA 02109
Telephone: 617.526.6243
Facsimile: 617.526.5000

/s/ Philip Ou

Yar R. Chaikovsky
Bryan K. James (*pro hac vice*)
Philip Ou (*pro hac vice*)
MCDERMOTT WILL & EMERY LLP
275 Middlefield Road, Suite 100
Menlo Park, California 94025-4004
Telephone: +1 650 815 7400
Facsimile: +1 650 815 7401
Email: ychaikovsky@mwe.com
Email: bjames@mwe.com
Email: pou@mwe.com

E. Leon Carter (Texas Bar No. 03914300)
Linda R. Stahl (Texas Bar No. 00798525)
CARTER SCHOLER ARNETT HAMADA &
MOCKLER, PLLC
Campbell Centre II
8150 N. Central Expressway, 5th Floor
Dallas, Texas 75206
Telephone: +1 214 550 8160

kevin.prussia@wilmerhale.com

Attorneys for Defendant APPLE INC.

s/ Steven D. Moore

Steven D. Moore (pro hac vice)
smoore@kilpatricktownsend.com
KILPATRICK TOWNSEND LLP
Eighth Floor
Two Embarcadero Center
San Francisco, CA 94111
(415) 576.0200 (telephone)
(415) 576.0300 (facsimile)

D. Clay Holloway (pro hac vice)
dholloway@kilpatricktownsend.com
Shayne E. O'Reilly (pro hac vice)
soreilly@kilpatricktownsend.com
KILPATRICK TOWNSEND LLP
Suite 2800
1100 Peachtree Street
Atlanta, Georgia 30309-4530
(404) 815-6500 (Telephone)
(404) 815-6555 (Facsimile)

GRUBER HURST JOHANSEN HAIL
SHANK
MICHAEL K. HURST (Bar No. 10316310)
mhurst@ghjhlaw.com
JOSHUA M. SANDLER (Bar No.
24053680)
jsandler@ghjhlaw.com
1445 Ross Avenue
Suite 2500
Dallas, Texas 75202
Telephone: 214 855 6800
Facsimile: 214 855 6808

***Attorneys for Defendant MOTOROLA
MOBILITY LLC***

Facsimile: +1 214 550 8185

Email: lcarter@carterscholer.com

***Attorneys for Defendants
HTC CORPORATION and HTC
AMERICA, INC.***

CERTIFICATE OF SERVICE

The undersigned certifies that on this 13th day of March, 2015, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system under Local Rule 5.1(d). Any other counsel of record will be served by a facsimile transmission and/or first class mail.

/s/ Julie A. Duncan

Julie A. Duncan